

RM-8626

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FCC

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The Secretary, FCC
Washington, DC 20554

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In the Matter of

Amendment of Part 97 of the Commission's Rules to Eliminate Certain One-Way Communications in RM No. 8626 the Amateur Radio Service Medium and High Frequency Bands

To: The Commission

The non-profit Courage HANDI-HAM System has worked for over 25 years assisting persons with physical disabilities and sensory impairments to learn Amateur Radio. The System provides study materials in adapted formats, training in adapted settings (Radio Camps in Minnesota and California) and specialized equipment adaptations

In the abovenamed petition, the petitioner makes several points relevant to the services we deliver to our members, to wit:

Petitioner: "There was a time in the history of the Amateur Radio Service when the benefit to be derived from permitting occasional one-way broadcasts on hf bands outweighed the negative impact of operations of this type on ordinary communications. That time has now passed."

HANDI-HAMS: The Amateur community still benefits from the occasional use of the HF bands by bulletin stations. The negative impact of such operations is overstated and there is nothing but anecdotal evidence to the contrary. Further, the same situation may arise any time two stations meet for a scheduled contact. The problem is ordinarily resolved in a spirit of cooperation and good sense, as most users recognize the need to set specific meeting places and times to conduct certain operations.

Petitioner: "Today there are plenty of other methods of communicating general information to Amateurs, including Amateur vhf packet networks, on-line computer services such as CompuServe, Prodigy, America Online and the World Wide Web pages of the Internet."

HANDI-HAMS: While there are certainly more options for communicating general information to Amateurs, it cannot be assumed that all Amateurs can

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take advantage of computer technology. The fact is that many Amateurs, including many of our members with physical disabilities, cannot afford computer equipment or the necessary adaptations to accommodate it to their physical or sensory restrictions. The petition, if allowed, would discriminate against persons with physical disabilities and sensory impairments by removing a viable source of general information that is already sent out in an easy-to-access, technologically friendly, and widely accepted format by existing bulletin stations on the HF bands. The wider Amateur community certainly cannot expect to have an array of computer technology in every conceivable situation. Computer technology, while valuable in many settings, cannot replace HF voice or code bulletins when received in mobile operation. Furthermore, computer technology complicates (even while enhancing) operations under emergency conditions, and its lack of robustness make it prone to failures under extreme or adverse conditions.

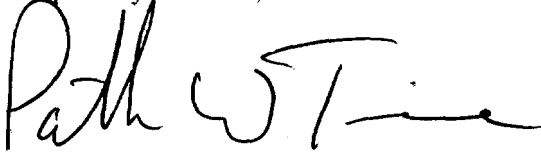
Petitioner: "Similarly, code practice is now easily accomplished via software training and simulation programs."

HANDIHAMS: True, if you can afford the necessary equipment. Again, this discriminates against persons with physical disabilities and sensory impairments, who would be forced to abandon a simple system that works well for an expensive adapted computer setup.

CONCLUSION

The petition should be denied. Bulletin operations in the HF spectrum have a significant following, and there is nothing in the petitioner's argument to affirm such assertions put forth by petitioner implying that bulletin operations are responsible for a rising "level of anger". Indeed, there is nothing to quantify any of these theories, and such evidence as there is purely anecdotal. Thus, the conclusions of the petitioner are simply his opinions, and, while the petitioner's qualifications and background in the Amateur Service cannot be denied, the Commission should not act upon such a radical proposal on the basis of one person's observations and opinions. Further, granting the petition would discriminate against a segment of the Amateur community with the least ability to employ alternate means suggested by the petitioner, those persons with physical disabilities and sensory impairments. This would be a clear reversal of the trend to bring such persons into the wider Amateur Community and to help them to be as self-sufficient as other Amateurs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Patrick W. Tice". The signature is fluid and cursive, with the first name "Patrick" being the most prominent part.

Patrick W. Tice, WA0TDA

Manager, Courage HANDI-HAM System